

SUPPRESSED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUN 14 2023

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARTEZ D. LINDSEY,

Defendant.

No

4:23CR310 MTS/RHH

INDICTMENT

The Grand Jury charges that:

COUNT ONE

18 U.S.C. § 922(g)(1)

(Possession of a Firearm by a Convicted Felon)

On or about April 25, 2023, in the City of St. Louis, within the Eastern District of Missouri,
the Defendant,

MARTEZ D. LINDSEY,

knowing he previously had been convicted of one or more crimes punishable by a term of imprisonment
exceeding one year, knowingly possessed a firearm, which had traveled in interstate or foreign
commerce—all in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g) or 924(c) as set forth above, the Defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in said violation(s).

2. If any of the property described above, as a result of any act or omission of the

Defendant

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

SAYLER A. FLEMING
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ZACHARY M. BLUESTONE, #69004MO
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